

**RUBIN LLC**

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April 21, 2021

Via ECF and Email

The Honorable Nancy Hershey Lord  
United States Bankruptcy Judge  
United States Bankruptcy Court  
271-C Cadman Plaza East  
Brooklyn, NY 11201

Re: In re Admiral Property Group LLC, Chapter 11 Case No. 20-42826 (NHL)

Dear Judge Lord:

This firm is counsel for Rosewood Realty Group (“Rosewood”), the real estate advisor for the above-referenced debtor (the “Debtor”). We write regarding the letters to the Court dated April 19, 2021 sent by Mr. Ringel and Mr. Kantrow.

Rosewood’s goal is to protect the ability of the Debtor’s estate to complete the sale process for the Debtor’s real property located at 157 Beach 96<sup>th</sup> Street, Queens, New York (the “Property”) so as to maximize value for the benefit of all interested parties. The correspondence from counsel to the Court reveals that, without explanation, the Debtor’s principal has directed the withdrawal of the disclosure statement and plan of reorganization that the Debtor filed with the Court on March 26, 2021.

The stalking horse bidder’s contract is the result of a robust marketing campaign, and comprehensive negotiations that Rosewood conducted since November 2020, which left no stone unturned. By order dated January 14, 2021, this Court approved the Debtor’s retention of Rosewood effective as of November 18, 2020. Leveraging its extensive experience marketing properties of real estate debtors in Chapter 11 cases, Rosewood’s marketing effort for the Debtor, which is ongoing, has included, among other things:

1. An email campaign that Rosewood created and sent to over 39,000 investors;
2. Sending emails to 2,540 bankruptcy and real estate attorneys and trustees;
3. Hiring a third-party service to take aerial photos of the Property and create offering materials;

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4. Designing a 46-page offering memorandum to email to investors;
5. Posting a listing for the Property on Rosewood's website and other real estate websites such as CoStar / Loopnet, Crexi, Brevitas, Crezma, and Propertyshark / Commercial Café;
6. Utilizing Rosewood's proprietary database of Queens, New York and nationwide developers;
7. Contacting recent buyers and sellers of real property in Queens and Brooklyn using real time market data;
8. Telephone calls to over 1,200 investors and developers and bankruptcy professionals;
9. Distributing this listing to brokers within Rosewood and discussing this opportunity on weekly company-wide phone calls;
10. Sending Email campaigns to the outside brokerage community; and
11. Arranging to have the Property featured in the New York Real Estate Journal ("NYREJ") as "Property of the Month" and sending a "Hot Property Alert" to the NYREJ database

These efforts generated significant interest. Twenty-nine (29) potential buyers signed non-disclosure agreements with Rosewood regarding the Property. Rosewood conducted twenty-two (22) in-person inspections of the Property with potential buyers. Rosewood received over two hundred (200) expressions of interest in response to its marketing campaign. Rosewood procured over sixty (60) offers or indications of bids. After extensive negotiations, and consultations with counsel, the stalking horse bidder's offer was selected as the highest and best bid, subject to a further market test, namely an auction to be conducted pursuant to proposed bidding procedures that were filed with the Court on March 26, 2021 and scheduled to be considered by the Court in conjunction with the Debtor's proposed disclosure statement on April 27, 2021.

Both the Debtor and the secured creditor were pleased with Rosewood's work and the stalking horse price achieved. Having such harmony is often difficult, but it indicates that the marketing and negotiation process was fair, well run and had a successful outcome. The stalking horse bidder is a credible investor who demonstrated its good faith and commitment to close by posting a deposit in an amount equal to twenty percent (20%) of its purchase price.

Rosewood respectfully submits that it would be unfortunate to let the opportunity for a successful reorganization be thrown away at this late juncture after having run such an extensive campaign that achieved such a favorable result, a sale price deemed to be commendable by the lender and the professionals involved. Anyone who wishes to submit a higher and better offer for the Property is welcomed and encouraged to do so in accordance with the proposed bid procedures, and an auction will provide a full and fair opportunity to do so. In fact, we will continue to market the property up through the date of the auction to further maximize the sale price if there is another bona fide buyer(s).

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We thank the Court for its consideration of Rosewood's concerns.

Respectfully submitted,

RUBIN LLC

By: /s/ Paul A. Rubin  
Paul A. Rubin

cc: (Via Email)

Fred Kantrow, Esq.

Fred Ringel, Esq.

Daniel Zinman, Esq.

Harlan Lazarus, Esq.

Rachel Wolf, Esq.

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